

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

KAREN COCHENOUR, individually and on)	
behalf of others similarly situated,)	
)	
Plaintiff,)	
)	Civil Action No. 1:25-CV-00007-RP
v.)	
)	
360TRAINING.COM, INC., D/B/A)	
MORTGAGE EDUCATORS AND)	
COMPLIANCE, INC.,)	
)	
Defendant.)	

DEFENDANT'S APPENDIX IN SUPPORT OF ITS MOTION TO DISMISS

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Defendant.)	

DECLARATION OF MUHAMMAD HUSSAM MEHMOOD

I, Muhammad Hussam Mehmood, respectfully declare under penalty of perjury, pursuant to 28 U.S.C. § 1746 and based on my own personal knowledge, that the following statements are true:

1. I am a VP of Operations and Regulatory for 360training.com, Inc. d/b/a Mortgage Educators and Compliance, Inc. (“Mortgage Educators”).
2. Through my role as VP of Operations and Regulatory, I am familiar with Mortgage Educators’ course offerings, including Mortgage Loan Originator (“MLO”) courses. I am also generally familiar with the National Multistate Licensing System / Nationwide Mortgage Licensing System and Registry (“NMLS”).
3. NMLS is the legal system of record for licensing and registration of MLOs in most states, including Pennsylvania.¹ As such, NMLS “is the official and sole system for companies and

¹ See *About NMLS*, <https://mortgage.nationwidelicensingsystem.org/about/SitePages/default.aspx> (last visited Feb. 25, 2025); *Frequently Asked Questions*, <https://mortgage.nationwidelicensingsystem.org/consumer/resources/sitepages/default.aspx> (last visited Feb. 25, 2025).

individuals seeking to apply for, amend, renew, and surrender licenses managed in the NMLS on behalf of the jurisdiction's governmental agencies."²

4. Mortgage Educators is an NMLS-approved prelicensure education and continuing education provider. Mortgage Educators owns and operates <https://mortgageeducators.com/> (the "Website").

5. The Website sells national and state-specific MLO license and continuing education courses that satisfy national and state-specific continuing education requirements, including those in Pennsylvania.

6. After users complete a prelicensure education or continuing education course on the Website, Mortgage Educators is required to report the completion of that course to NMLS within seven days so NMLS can track compliance.³

7. NMLS also maintains a website, NMLS Consumer Access, where any member of the public can look up a company or individual with whom they are contemplating doing business to verify whether that company or individual is authorized to do business. *See* <https://www.nmlsconsumeraccess.org/>.

8. I reviewed Pennsylvania's continuing education requirements reflected in 7 Pa. Cons. Stat. § 6131.1(d)(1) (2022), and the Pennsylvania-specific requirements match the topics covered in Mortgage Educators' 7-hour Core SAFE Continuing Education Course, including three hours of federal law and regulations, two hours of ethics, and two hours of training related to non-traditional lending standards. *See* **Exhibit A**, 7 Pa. Cons. Stat. § 6131.1(d)(1) (2022).

² *Id.*

³ *Education FAQ - NMLS Approved Education for MLO Licensure*, Nationwide Multistate Licensing System, https://nmlsportal.csbs.org/csm?id=kb_article_view&sysparm_article=KB0016840&sys_kb_id=4988b9e71b064a1086ee62c0604bcb92 (last visited Feb. 25, 2025).

9. Defendant also offers a 1-hour Pennsylvania SAFE State Law Continuing Education Course to satisfy the Pennsylvania-specific continuing education requirement outlined in 7 Pa. Cons. Stat. § 6131.1(d)(1)(iv) (2022).

10. Plaintiff Karen Cochenour (“Plaintiff”) purchased four courses from Mortgage Educators between January 1, 2023 through December 31, 2024. A true and correct copy of Mortgage Educators’ business records reflecting Plaintiff’s purchases in this timeframe is attached as **Exhibit B**. These courses included: (1) 2023 1 Hour PA SAFE State Law Continuing Education Course #15061; (2) 2023 7 Hour Core SAFE Continuing Education Course #15064; (3) 2024 1 Hour PA SAFE State Law Continuing Education Course #15951; and (4) 2024 7 Hour Core SAFE Continuing Education Course #16070. *Id.* These courses have all been approved by NMLS to satisfy federal and Pennsylvania state continuing education requirements for MLO license renewals. As required by NMLS, Mortgage Educators reported Plaintiff’s completion of these courses to NMLS so NMLS can track Plaintiff’s compliance with Pennsylvania’s continuing education requirements.

11. On February 25, 2025, I visited the NMLS Consumer Access website, which is publicly available at <https://nmlsconsumeraccess.org/>, and searched for “Karen Cochenour.” A true and correct copy of the NMLS information returned from my search is attached as **Exhibit C**. These publicly available records on the NMLS Consumer Access website reflect that Plaintiff was licensed as an MLO on or around March 4, 2022. *See Exhibit C*.

12. According to the NMLS website, Plaintiff’s MLO licensure status as of November 3, 2022, has been “Approved-Inactive.” *Id.*

13. The NMLS website provides an overview of license status definitions. A true and correct copy of these definitions that I obtained from the NMLS website is attached as **Exhibit D**.

“Approved-Inactive” status is assigned when “the last active sponsorship is removed from a mortgage loan originator license” or “when an entity or individual informs a regulator (outside NMLS) that they do not intend to conduct business under the license for a period of time, but will continue to comply with certain licensing requirements in order to retain the license.” **Exhibit D, License Status Definitions, State Regulatory Registry LLC**, <https://mortgage.nationwidelicensingsystem.org/consumer/resources/NMLS%20Document%20Library/License%20Status%20Chart.pdf> (last visited Feb. 25, 2025).

14. Because Plaintiff has had this status since 2022, and continuing education requirements must be completed on an annual basis, *see* **Exhibit A**, the publicly available NMLS records confirm that Plaintiff has completed the eight hours of continuing education courses required to maintain her MLO license for the years 2022, 2023, and 2024. Those include the eight hours of continuing education that Plaintiff took from Mortgage Educators in 2023 and 2024.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 2/28/2025 | 8:52 AM PST

Signed by:

 6045784F63F942D...

EXHIBIT A

Purdon's Pennsylvania Statutes and Consolidated Statutes

Title 7 Pa.C.S.A. Banks and Banking

Part II. Licensing

Chapter 61. Mortgage Loan Industry Licensing and Consumer Protection (Refs & Annos)

Subchapter D. Administrative and Licensure Provisions

7 Pa.C.S.A. § 6131.1

§ 6131.1. Prelicensing and continuing education

Currentness

(a) General requirements.--

- (1) Applicants shall complete prelicensing education required under subsection (b) and pass a written test regarding the education under subsection (c) in order to obtain a license under this chapter.
- (2) Licensees shall complete continuing education required under subsection (d) in order to renew a license under this chapter.

(b) Prelicensing education.--

- (1) A mortgage originator applicant, and at least one qualifying individual of a mortgage broker or mortgage lender applicant, shall complete at least 20 hours of education programs approved in accordance with paragraph (2), which shall include all of the following:
 - (i) Three hours of Federal law and regulations.
 - (ii) Three hours of ethics, which shall include instruction on fraud, consumer protection and fair lending issues.
 - (iii) Two hours of training related to lending standards for the nontraditional mortgage loan marketplace.
 - (iv) Three hours of Pennsylvania law and regulations, including this chapter, the act of December 3, 1959 (P.L. 1688, No. 621),¹ known as the Housing Finance Agency Law, and the act of January 30, 1974 (P.L. 13, No. 6),² referred to as the Loan Interest and Protection Law.
- (2) Prelicensing education programs shall be reviewed and approved by the Nationwide Mortgage Licensing System and Registry or as otherwise determined by the department based upon reasonable standards. Review and approval of a prelicensing education program shall include review and approval of the program provider.

(3) A prelicensing education program approved by the Nationwide Mortgage Licensing System and Registry or as otherwise determined by the department may be provided by the sponsor of the applicant or an entity which is affiliated with the applicant by an agency contract, or any subsidiary or affiliate of such sponsor or entity.

(4) Prelicensing education programs may be offered either in a classroom, online or by any other means approved by the Nationwide Mortgage Licensing System and Registry or as otherwise determined by the department.

(5) Except for prelicensing education programs under paragraph (1)(iv), prelicensing education programs approved by the Nationwide Mortgage Licensing System and Registry or as otherwise determined by the department and completed for another State license application shall be accepted as credit toward completion of the prelicensing education requirements of this chapter.

(6) An applicant that was previously licensed under this chapter that is applying to become licensed again under this chapter must demonstrate that the applicant has completed all of the continuing education requirements for the year in which the applicant was last licensed under this chapter.

(c) Prelicensing written test.--

(1) A mortgage originator applicant, and at least one qualifying individual of a mortgage broker or mortgage lender applicant, shall pass, in accordance with the standards established under this subsection, a qualified written test developed by the Nationwide Mortgage Licensing System and Registry and administered by a test provider approved by the Nationwide Mortgage Licensing System and Registry based upon reasonable standards. The department may also require applicants to pass a test regarding Pennsylvania-specific law, which shall be administered by a test provider approved by the department or as otherwise determined by the department under subsection (e).

(2) A written test shall not be treated as a qualified written test for purposes of paragraph (1) unless the test adequately measures the applicant's knowledge and comprehension in appropriate subject areas, including:

(i) Ethics.

(ii) Federal law and regulation pertaining to mortgage origination.

(iii) Pennsylvania law and regulation pertaining to mortgage origination, unless otherwise determined by the department.

(iv) Federal and Pennsylvania law and regulation related to fraud, consumer protection, the nontraditional mortgage marketplace and fair lending issues.

(3) A test provider approved by the Nationwide Mortgage Licensing System and Registry or as otherwise determined by the department may provide a test at the location of the sponsor of the applicant or an entity which is affiliated with the applicant by an agency contract, or any subsidiary or affiliate of the sponsor or entity.

(4)(i) An applicant shall not be considered to have passed a qualified written test unless the individual achieves a test score of not less than 75% correct answers to questions.

(ii) An applicant may take a test three consecutive times with each consecutive taking occurring at least 30 days after the preceding test.

(iii) After failing three consecutive tests, an applicant shall wait at least six months before taking the test again.

(iv) A formerly licensed mortgage originator applicant who has been unlicensed for five continuous years or longer shall retake a test. Any time during which the individual is a registered mortgage loan originator shall not be counted toward the five-year continuous period.

(d) Continuing education.--

(1) A licensee who is a mortgage originator and all branch managers and qualifying individuals of a mortgage broker or mortgage lender shall annually complete at least eight hours of education programs in accordance with paragraph (2), which shall include all of the following:

(i) Three hours of Federal law and regulations.

(ii) Two hours of ethics, which shall include instruction on fraud, consumer protection and fair lending issues.

(iii) Two hours of training related to lending standards for the nontraditional mortgage loan marketplace.

(iv) One hour of Pennsylvania law, including this chapter, the act of December 3, 1959 (P.L. 1688, No. 621), known as the Housing Finance Agency Law, and the act of January 30, 1974 (P.L. 13, No. 6), referred to as the Loan Interest and Protection Law.

(2) Continuing education programs shall be reviewed and approved by the Nationwide Mortgage Licensing System and Registry or as otherwise determined by the department based upon reasonable standards. Review and approval of a continuing education program shall include review and approval of the program provider.

(3) A continuing education program approved by the Nationwide Mortgage Licensing System and Registry or as otherwise determined by the department may be provided by the sponsor of the licensee or an entity which is affiliated with the licensee by an agency contract, or any subsidiary or affiliate of the sponsor or entity.

(4) Continuing education programs may be offered either in a classroom, online or by any other means approved by the Nationwide Mortgage Licensing System and Registry or as otherwise determined by the department.

- (5) A licensee may only receive credit for a continuing education program in the year in which the program is taken and may not take the same continuing education program in the same or successive years to meet the requirements of this subsection.
- (6) A licensed mortgage originator who is an instructor of an approved continuing education program may receive credit for the licensed mortgage loan originator's own continuing education requirement at the rate of two hours credit for every one hour taught.
- (7) Except for the continuing education program under paragraph (1)(iv), continuing education programs approved by the Nationwide Mortgage Licensing System and Registry or as otherwise determined by the department and completed for another state shall be accepted as credit toward completion of the continuing education requirements of this chapter.
- (8) An individual who is a mortgage originator, branch manager or qualifying individual of a mortgage broker or mortgage lender is not required to complete the requirements of this subsection in any licensing year in which the individual has completed the requirements of subsection (b).

(e) Pennsylvania-specific education and testing programs.--

- (1) Pennsylvania-specific education and testing programs shall be approved by the department, unless otherwise determined by the department. The department may charge education and testing providers a fee, to be determined by the department, for department review of Pennsylvania-specific education and testing programs.
- (2) An education provider may apply for education and testing program approval on a form prescribed and provided by the department. The application shall be submitted to the department at least 60 days prior to the first date that the education is proposed to be offered. The application shall include:
- (i) An outline of the proposed education and testing program, and the method of instruction and testing, whether in a classroom, online or by any other means.
 - (ii) A resume detailing each proposed instructor's qualifications. The following individuals shall not be qualified to be instructors, unless the department determines otherwise:
 - (A) An individual who has had his license denied, not renewed, suspended or revoked by the department or any other state.
 - (B) An individual who has been the director, officer, partner, employee, agent or ultimate equitable owner of 10% or more of a licensee that has had its license denied, not renewed, suspended or revoked by the department or another state.
 - (C) An individual who has been subject to a department order or agreement prohibiting the individual from engaging in the mortgage loan business in this Commonwealth or acting in any other capacity related to activities regulated by the department or similar order or agreement issued by another state.

(D) An individual who has pleaded guilty, been convicted of or pleaded nolo contendere to a crime of moral turpitude or felony.

(iii) Other information that the department may require.

(3) The department shall be notified in writing at least 10 days prior to any change in instructors. A new instructor shall be subject to the criteria under paragraph (2)(ii).

(4) Education programs offered solely to satisfy the requirements of subsection (d) shall not be required to include a written testing component.

(5) The department shall have 45 days from receipt of a completed application to approve or deny the proposed education and testing program. An application shall be deemed completed when the requirements of this subsection have been fulfilled. If the department fails to approve or deny an application submitted by a prospective education provider within 45 days of its receipt, the education program shall be deemed approved by the department. The department may deny an application submitted by an education provider if the education and testing program or education provider fails to satisfy any of the conditions or requirements contained under this chapter.

(6) Approval of an education program by the department shall be valid for one licensing year and shall not constitute permanent approval of the education program.

(7) Education providers shall provide free access to the department to monitor education programs. In order to ensure the department's access to education programs, education providers shall provide the department with notification of the date, time and location of each education program that is offered by the education provider.

(8) Education providers shall retain original records of attendance for each education and testing program conducted by the education provider for four years and shall provide the department free access to the records upon request.

(9) The department may revoke its approval of an education provider's education and testing programs if the education provider fails to comply with any requirement of this chapter.

Credits

2009, Aug. 5, P.L. 117, No. 31, § 8, imd. effective. Amended 2013, July 2, P.L. 210, No. 38, § 3, effective in 60 days [Sept. 3, 2013]; 2022, Feb. 3, P.L. 24, No. 8, § 2, effective in 60 days [April 4, 2022].

Footnotes

1 35 P.S. § 1680.101 et seq.

2 41 P.S. § 101 et seq.

7 Pa.C.S.A. § 6131.1, PA ST 7 Pa.C.S.A. § 6131.1

Current through Act 2 of the 2025 Regular Session. Some statute sections may be more current, see credits for details.

End of Document

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EXHIBIT B

Name	User	Course name	Enroll	Completed	Banked
karen cochenour	KCOCHENOUR	2023 1 Hour PA SAFE State Law Continuing Education Course #15061	12/7/2023	12/9/2023	12/9/2023
karen cochenour	KCOCHENOUR	2023 7 Hour Core SAFE Continuing Education Course #15064	12/7/2023	12/13/2023	12/14/2023
karen cochenour	KCOCHENOUR	2024 1 Hour PA SAFE State Law Continuing Education Course #15951	12/27/2024	12/27/2024	12/30/2024
karen cochenour	KCOCHENOUR	2024 7 Hour Core SAFE Continuing Education Course #16070	12/27/2024	12/27/2024	12/30/2024

EXHIBIT C

**KAREN LYNN COCHENOUR**

NMLS ID: 2247986	Phone: 9258781400	Fax: Not provided
Other Names : karen lynn cochenour	Prior Other Names : None	Prior Legal Names : None
Regulatory Actions : None posted in NMLS.		

Employment

Authorized to Represent : None	Engaged in other businesses : Yes
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From	To	Employer	Position	City	State	Zip Code	Financial Services
11/2022	Present	SALON MELANGE	Owner	UPPER ST CLAIR	PA	15241	No
12/2021	11/2022	Rocket mortgage, llc	Mortgage Loan Originator	detroit	MI	48226	Yes
11/2021	12/2021	unem,ployed	unemployed	Upper Saint Clair	PA	15241	Yes
08/2021	10/2021	Budd Baer Subaru	Finance Mnagaer	washington	PA	15301	Yes
04/2018	10/2021	dirito brothers vw	Finance Manager	walnut Creek	CA	94596	Yes
03/2018	04/2019	Diablo Subaru	Finance Maneger	Walnut Creek	CA	94597	Yes
08/2013	02/2018	Mckevitt Fiat CDJR	Finance Manager	Berkeley	CA	94705	Yes
07/2013	08/2014	Concord Mitsubishi	Finance Manager	Concord	CA	94520	Yes
04/2012	07/2013	J C Pennys Hair Salon	hairstresser	myrtle Beach	SC	29577	No
08/2011	08/2012	Concord Mitsubishi	Finance Manager	walnut creek	CA	94597	Yes

Office Locations

Company	NMLS ID	Type	Street Address	City	State	Zip Code	Start Date
None							

State Licenses/Registrations (Displaying 0 Active, 1 Inactive of 1 Total)

Regulator	Lic/Reg Name	Authorized to Conduct Business	Consumer Complaint
Pennsylvania	Mortgage Originator License	No	Submit to Regulator
<div>Lic/Reg #: 97059Original Issue Date : 03/04/2022</div>			
<div>Status : Approved-InactiveStatus Date: 11/03/2022Renewed Through : 2025</div>			
Currently Authorized to Represent			
None			
<div>[+] View Previously Authorized to Represent</div>			

Regulatory Actions

While some state and federal agencies may add actions taken in previous years against a licensee, the majority are adding only new actions from 2012 or later. To view complete information regarding regulatory actions posted by the agency, click any regulator link.

No regulatory actions have been posted in NMLS.

Mortgage Regulators (AARMR) and is owned and operated by the **State Regulatory Registry LLC (SRR)**, a wholly owned subsidiary of CSBS. For more information about the System, please visit the **NMLS Resource Center** or the **NMLS Federal Registry Resource Center** websites. | [Download PDF Reader](#)

EXHIBIT D



License Status Definitions

The chart below provides the following for each license status currently available in NMLS: (i) definition and (ii) any action(s) that may be required by the licensee/applicant when their license record is assigned the status.

License Status	Definition	Action(s) Required by Licensee/Applicant under this status	Status Displayed on Consumer Access	Adverse Status
Transition Requested	Status assigned upon submission of a transition request.	Respond to any license items (requirements or deficiencies) placed by the regulator.	Not Displayed	N
Transition Cancelled	Status assigned upon submission of a filing request cancellation of a transition request.	None	Not Displayed	N
Transition Rejected	Status assigned when a regulator decides not to approve a transition request. Also used by regulators when the incorrect license type is identified for transition.	None	Not Displayed	N
Pending - Incomplete	Status assigned upon submission of a new license request.	Respond to any license items (requirements or deficiencies) placed by the regulator.	Not Displayed	N
Pending - Review	Status assigned once the regulator has received external documents per checklist, completes a preliminary review of new license request and decides to accept the filing for processing. Once the request is placed in this status, the regulator review clocks start.	Respond to any license items (requirements or deficiencies) placed by the regulator.	Not Displayed	N
Pending - Review (Temporary Authority)	Temporary Authority to Operate status assigned when Temporary Authority is Active, testing & education requirements have been met, and no regulator-set license items exist.	None	Temporary Authority	N

Updated: 4/23/2020

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License Status	Definition	Action(s) Required by Licensee/Applicant under this status	Status Displayed on Consumer Access	Adverse Status
Pending - Deficient	Status assigned when regulator has determined documents or information are incomplete or are missing from the license request.	Respond to any license items (requirements or deficiencies) placed by the regulator.	Not Displayed	N
Pending - Deficient (Temporary Authority Eligible)	Temporary Authority to Operate status assigned before Temporary Authority is Active while awaiting CBC results, CHRI review by the regulator, and a sponsorship request.	Respond to any license items (requirements or deficiencies)	Not Displayed	N
Pending - Deficient (Temporary Authority)	Temporary Authority to Operate status assigned when Temporary Authority is Active and CBC requirement has been completed, but there are pending testing & education requirements or active license items.	Complete testing & education requirements and respond to any license items (requirements or deficiencies)	Temporary Authority	N
Pending - Withdraw Requested	Status assigned when the applicant submits a filing to withdraw a license request.	None	Not Displayed	N
Withdrawn – Application Abandoned	Status assigned when the applicant has not responded to regulator requests for additional information within a timely manner.	None	Not Displayed	N
Withdrawn - Voluntary without Licensure	Status assigned upon acceptance of a withdraw request submitted by the applicant.	None	Not Displayed	N
Denied	Status assigned when regulator has reviewed the license requested and determined that sufficient grounds exist to deny the request. This status may also be used by regulators who deny a renewal request for license.	None	Denied	Y

License Status	Definition	Action(s) Required by Licensee/Applicant under this status	Status Displayed on Consumer Access	Adverse Status
Denied – On Appeal	Status assigned when regulator has reviewed the license request and determined that sufficient grounds exist to deny the request but applicant has appealed the decision.	Applicant must comply with requirements of the appeal process.	Not Displayed	Y
Pre-Approved (Temporary Authority)	Temporary Authority to Operate status assigned when Temporary Authority is Active and testing & education requirements have not been met, but all other licensing requirements have been met.	Complete testing & education requirements.	Temporary Authority	N
Approved	Status assigned when regulator has reviewed the license or transition request and decided to issue a license to the applicant through NMLS.	None	Approved	N
Approved-Conditional	Status assigned when the regulator has reviewed the license or transition request and decided to issue a license through NMLS provided certain conditions imposed by the regulator are met. This status may also be used (i) when a regulator has imposed an increased financial responsibility requirement on the licensee or (ii) if a licensee is subject to conditions set by an administrative order that do not otherwise restrict their ability to conduct lawful activities under the license.	Comply with any conditions communicated to the applicant by the regulator. Such conditions may be temporary or on-going.	Approved	N
Approved - Deficient	Status assigned when a regulator determines an entity is entitled to conduct business, but may be required to provide additional documentation/information to the regulator to comply with licensing requirements.	Respond to any license items (requirements or deficiencies) placed by the regulator.	Approved	N

License Status	Definition	Action(s) Required by Licensee/Applicant under this status	Status Displayed on Consumer Access	Adverse Status
Approved - Failed to Renew	Status assigned when a licensee with a perpetual license fails to file renewal prior to December 31 st .	Submit renewal request for the license under the renewal tab in NMLS.	Approved	N
Approved - Inactive	<p>Status assigned when (i) the last active sponsorship is removed from a mortgage loan originator license; or (ii) when an entity or individual informs a regulator (outside NMLS) that they do not intend to conduct business under the license for a period of time, but will continue to comply with certain licensing requirements in order to retain the license. The status may also apply when a new license applicant is not currently employed as a mortgage loan originator but meets all other licensing requirements. In such cases, the license may be displayed as "Approved-Inactive" until sponsorship by a mortgage company is acquired and approved by the regulator. Until sponsored and approved, the individual is prohibited from engaging in the business of a mortgage loan originator.</p> <p>This status also may be used for company licenses if the company is not associated with an approved qualifying individual.</p>	Mortgage loan originators seeking authorization to resume licensable activities under the license must seek a new sponsor and have the new sponsor submit a sponsorship request. Before obtaining authorization to resume licensable activities, entities must comply with requirements set by the regulator to request removal of the inactive status.	Approved-Inactive	N
Approved – On Appeal	Status assigned when a regulator has taken action to suspend or revoke an approved license, the entity has appeal the decision and the entity is authorized to continue to conduct business while the action is on appeal. This status also may be used if a regulator rejects a renewal request and the licensee appeals the rejection.	Licensee must comply with requirements of the appeal process.	Approved	Y

License Status	Definition	Action(s) Required by Licensee/Applicant under this status	Status Displayed on Consumer Access	Adverse Status
Approved – Surrender/Cancellation Requested	Status assigned when a licensee submits a surrender/cancellation request to a regulator.	Licensee must comply with any requirements set by the regulator for surrender/cancellation of a license.	Approved-Surrender/Cancellation Requested	N
Revoked	Status assigned when a regulator has taken action to revoke the license. Pursuant to federal SAFE legislation, placement of a mortgage loan originator license into this status will render the mortgage loan originator unable to obtain or retain a license to conduct mortgage business in any jurisdiction.	None	Revoked	Y
Revoked – On Appeal	Status assigned when a licensee has appealed a regulator's action to revoke the license.	Licensee must comply with all requirements of the appeal process.	Revoked-On Appeal	Y
Suspended	Status assigned when a regulator has taken action to suspend the license.	None	Suspended	Y
Suspended - On Appeal	Status assigned when a licensee has appealed a regulators action to suspend the license.	Licensee must comply with all requirements of the appeal process.	Suspended-On Appeal	Y
Temporary Cease and Desist	Status assigned when a regulator issues a temporary cease and desist order against the licensee.	Respond to and comply with any requirements/restrictions set forth in the order.	Temporary Cease and Desist	Y

License Status	Definition	Action(s) Required by Licensee/Applicant under this status	Status Displayed on Consumer Access	Adverse Status
Terminated - Expired	Status assigned to a non-perpetual license when entity fails to renew a license by the end of the Reinstatement Period or the jurisdiction's deadline (whichever is earlier), marks a license as Do Not Renew or has failed to address outstanding issues with a license that has been suspended.	None (New license request must be filed if the entity wishes to obtain authorization to resume licensable activities.)	Expired	N
Terminated - Failed to Renew	Status assigned to a non-perpetual license when a licensee fails to file for renewal prior to December 31 st or marks a license as Do Not Renew. The licensee is not authorized to conduct business with a license in this status.	Licensees wishing to retain their license should file a renewal/reinstatement request under the Renewal Tab prior to the end of the regulators reinstatement period, if applicable.	Expired	N
Terminated - Ordered to Surrender	Status assigned when a regulator orders a licensee to surrender their license.	Licensee must comply with terms of order.	Ordered to Surrender	Y
Terminated - Surrendered/Cancelled	Status assigned when a regulator approved a surrender/cancellation request submitted by the licensee.	None	Voluntary Surrender	N

NOTE: The *Adverse Status* indicator for a license is currently shown in the Company Snapshot and in the License/Registration List page under the Composite View tab.

CERTIFICATE OF SERVICE

I hereby certify that on this date, March 5, 2025, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record. I further certify that a true and correct copy of the foregoing document was served via certified mail on the following:

Pamela Bondi
Attorney General for the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

/s/ Rachel Palmer Hooper